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May 5, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 94-102, ex parte communication

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Rules, this is to advise you that Rick Jones, Operations Issues Director of the National Emergency Number Association ("NENA"), met with Eugenie Barton and Pat Forster of the Wireless Telecommunications Bureau Monday, April 28, 2003, regarding surrogate number delivery for non-registered wireless phones placing 9-1-1 calls. As described in Annex C of TIA's J-STD-036, the delivery would make use of the digits "911" and the final seven digits of a handset's ESN or IMEI. (*See* note 1, below.)

Mr. Jones generally expressed NENA's support for the ex parte communication on the subject, filed February 24, 2003, on behalf of the Emergency Services Interconnection Forum ("ESIF") of the Alliance for Telecommunications Industry Solutions ("ATIS"). His particular purpose was to reinforce the following statement from the February 24th letter:

Network providers should be able to provide, on a timely basis, the necessary subscriber information, which may include the MIN, MDN and/or ESN/IMEI.¹

¹ MIN=Mobile Identification Number; MDN=Mobile Directory Number; IMEI=International Mobile Station Equipment Identity.

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- 2 -

Mr. Jones specified that “timely basis” means, from NENA’s perspective, “within minutes.” He also noted that in cases of threats, harassment and false reporting using 9-1-1, the ability to associate the name and address of a present or former user could be critical.

While the February 24th ESIF communication proposed that surrogate number delivery be accomplished voluntarily by carriers, as they adopt J-STD-036, if the FCC chooses instead to mandate the solution it must be accompanied by data base support. That is, the wireless carrier must be able to provide a Public Safety Answering Point quickly with the MIN, MDN or full ESN/IMEI associated with the surrogate 10-digit number.

Please direct any questions to the undersigned.

Sincerely,

James R. Hobson
Counsel for NENA

cc: Eugenie Barton, Patrick Forster